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*Attorneys for Parmjit Singh Parmar and the  
Parmar Entities*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11 Case

ORION HEALTHCORP, INC.  
CONSTELLATION HEALTHCARE TECHNOLOGIES, INC.  
NEMS ACQUISITION, LLC  
NORTHEAST MEDICAL SOLUTIONS, LLC  
NEMS WEST VIRGINIA, LLC  
PHYSICIANS PRACTICE PLUS, LL  
PHYSICIANS PRACTICE PLUS HOLDINGS, LLC  
MEDICAL BILLING SERVICES, INC.  
RAND MEDICAL BILLING, INC.  
RMI PHYSICIANS SERVICES CORPORATION  
WESTERN SKIES PRACTICE MANAGEMENT, INC.  
INTEGRATED PHYSICIAN SOLUTIONS, INC.  
NYNM ACQUISITION, LLC  
NORTHSTAR FHA, LLC  
NORTHSTAR FIRST HEALTH, LLC  
VACHETTE BUSINESS SERVICES, LTD.  
MDRX MEDICAL BILLING, LLC  
VEGA MEDICAL PROFESSIONALS, LLC  
ALLEGIANCE CONSULTING ASSOCIATES, LLC  
ALLEGIANCE BILLING & CONSULTING, LLC  
PHOENIX HEALTH, LLC  
NEW YORK NETWORK MANAGEMENT, LLC

No. 18-71748 (AST)  
No. 18-71749 (AST)  
No. 18-71750 (AST)  
No. 18-71751 (AST)  
No. 18-71752 (AST)  
No. 18-71753 (AST)  
No. 18-71754 (AST)  
No. 18-71755 (AST)  
No. 18-71756 (AST)  
No. 18-75757 (AST)  
No. 18-75758 (AST)  
No. 18-75759 (AST)  
No. 18-75760 (AST)  
No. 18-75761 (AST)  
No. 18-75762 (AST)  
No. 18-75763 (AST)  
No. 18-75764 (AST)  
No. 18-75765 (AST)  
No. 18-75766 (AST)  
No. 18-75767 (AST)  
No. 18-71789 (AST)  
No. 18-74545 (AST)

Debtors.

(Jointly Administered)

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Orion Healthcorp, Inc., *et al.*,

Plaintiffs,

v.

Parmjit Singh Parmar (a/k/a Paul Parmar), Sotirios Zaharis, Ravi Chivukula, Pavandeep Bakhshi, Naya Constellation Health LLC, Alpha Cepheus, LLC, Constellation Health Investment, LLC, Constellation Health Group, LLC, Constellation Health, LLC, First United Health, LLC, Taira no Kiyomori LLC, Blue Mountain Healthcare, LLC, CC Capital CHT Holdco LLC, CHT Holdco LLC, PBPP Partners LLC, Axis Medical Services, LLC, Vega Advanced Care LLC, Pulsar Advance Care LLC, Lexington Landmark Services LLC, MYMSMD LLC, PPSR Partners, LLC, AAKB Investments Limited, Destra Targeted Income Unit Investment Trust, on behalf of unitholders, a Delaware Statutory Trust, United States of America, Aquila Alpha LLC, 2 River Terrace Apartment 12J, LLC, Dioskouroi Kastor Polydeuces, LLC, 21B One River Park LLC, Aquila Alshain LLC, Ranga Bhoomi LLC, Harmohan Parmar (a/k/a Harry Parmar), Kiran Sharma, The Red Fronted Macaw Trust, Young Conaway Stargatt & Taylor, LLP (in its capacity as Escrow Agent), Blue Cross Blue Shield of South Carolina, Honorable Trinidad Navarro, Insurance Commissioner of the State of Delaware, in his capacity as Receiver, and John Does 1 through 100 inclusive,

Adv. Pro No. 18-08053 (AST)

Defendants.

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-----X  
Parmjit Singh Parmar, First United Health, LLC, and Constellation Health, LLC,

Cross-claim Plaintiffs,

v.

CC Capital CHT Holdco LLC and CHT Holdco LLC,

Cross-claim Defendants.

**STIPULATION AND ORDER TO WITHDRAW  
PARMIT SINGH PARMAR'S MOTION TO STAY  
THE ADVERSARY PROCEEDING AND TO STAY DISCOVERY  
AS AGAINST PARMIT SINGH PARMAR AND ANY RELATED ENTITIES**

**WHEREAS**, Parmjit Singh Parmar a/k/a Paul Parmar ("Parmar") and certain of the entities owned or controlled by Parmar, as defendants in the above-captioned Adversary Proceeding, ("Parmar Moving Entities", and together with Parmar, "Moving Defendants")<sup>1</sup> moved, by Order to Show Cause, on July 23, 2018, to Stay the above-captioned Adversary Proceeding pending the resolution of a related Criminal Proceeding (the "Motion") (Docket No. 63).

**WHEREAS**, Debtors and Debtors in Possession, as Plaintiffs in the above-captioned Adversary Proceeding ("Plaintiffs"), filed an objection to Moving Defendants' Motion on August 14, 2018 (Docket No. 81).

**WHEREAS**, no ruling has been made in relation to Moving Defendants' Motion.

**WHEREAS**, the parties have agreed to the following terms to avoid the need to adjudicate Moving Defendants' Motion.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned, as follows:

1. Moving Defendants hereby withdraw their Motion without prejudice.
2. Plaintiffs hereby agree to stay discovery indefinitely in the captioned Adversary Proceeding, solely as against Moving Defendants, which stay can be automatically terminated on ten (10) days' written notice by Plaintiffs to the undersigned counsel for Moving Defendants.

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<sup>1</sup> Specifically, the Parmar Moving Entities are Constellation Health LLC, Constellation Health Investment LLC, First United Health LLC, Naya Constellation Health LLC, Alpha Cepheus LLC and Blue Mountain Healthcare, LLC. Sage Group Consulting, Inc. also joins in the relief requested, however, that entity is not a named defendant herein.

3. The parties agree that if Plaintiffs terminate the stay pursuant to paragraph 2, Moving Defendants may renew their Motion, or seek alternative relief as they deem necessary.

4. Plaintiffs do not by this Stipulation consent to the relief sought, or accept the validity of, the Motion or any motions seeking similar or alternative relief.

5. This Stipulation is solely for the purpose of consensual resolution of Moving Defendants' Motion and is without prejudice to Plaintiffs' or Moving Defendants' legal and equitable rights and defenses in this Adversary Proceeding.

6. **IT IS FURTHER STIPULATED AND AGREED** that this Stipulation may be signed in counterparts, and facsimile signatures are valid and binding as original, and filed without further notice.

Dated: New York, New York  
August 16, 2018

**HAHN & HESSEN LLP**

**WINDELS MARX LANE &  
MITTENDORF, LLP**

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*Attorneys for Defendants Parmjit Singh  
Parmar and certain of the entities  
owned or controlled by Parmar*